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BEFORE THE ARIZONA CORPORATION COMMISSION

2007 SEP 19 P 12: 26

COMMISSIONERS

MIKE GLEASON, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

Arizona Corporation Commission

DOCKETED

SEP 19 2007

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In the matter of:

EDWARD A. PURVIS and MAUREEN H.
PURVIS, husband and wife
1231 W. Shannon
Chandler, Arizona 85224

GREGG L. WOLFE and ALLISON A.
WOLFE, husband and wife
2092 W. Dublin Lane
Chandler, Arizona 85224

NAKAMI CHI GROUP MINISTRIES
INTERNATIONAL, (a/k/a NCGMI), a
Nevada corporation sole
4400 N. Scottsdale Road, Suite 9-231
Scottsdale, Arizona 85251

JAMES W. KEATON, Jr. and JENNIFER
KEATON, husband and wife
11398 E. Whitehorn Drive, Apt. D
Scottsdale, Arizona 85255

ACI HOLDINGS, INC., a Nevada corporation
17650 N. 25th Avenue
Phoenix, Arizona 85023

Respondents.

Docket No. S-20482A-06-0631

**PURVIS' REPLY IN SUPPORT
OF NOTICE FOR SUBPOENAS**

AND

**RESPONSE TO MOTION TO SET
DEADLINES**

MEMORANDUM OF POINTS AND AUTHORITIES

The Securities Division's response to the Notice of Request for Issuance of Subpoenas is moot. The subpoenas have already been issued. However, certain inaccuracies in the Division's response need to be corrected.

First, the Division *did not* respond to undersigned counsel's repeated e-mail

1 requests for access to the Keating/ACI/CSI documents. Undersigned counsel sent many
2 emails to the Division's counsel on the issue, and no response was received before the
3 Notice was filed. It appears that the Division chose to ignore the emails and respond by
4 letter, which was mailed (rather than sent by email or fax) to undersigned counsel. Of
5 course, this letter did not arrive until after the subpoenas had been submitted.

6 Moreover and more importantly, the Division's offer to produce documents is
7 materially deficient. The Division admits that it has unilaterally redacted information
8 from the documents. This cannot be countenanced.

9 Regarding the motion to set deadlines, again this issue has been mooted by the
10 schedule set forth by the ALJ.

11 RESPECTFULLY SUBMITTED this 19th day of September 2007.

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13 Renaissance One, Two North Central Avenue
Phoenix, Arizona 85004-2391

14
15 By 

16 John Maston O'Neal
Zachary Cain

17 Attorneys for Respondents
Edward A. Purvis and Maureen H. Purvis

18 **ORIGINAL** and **13 COPIES** filed
19 this 19th day of September, 2007, with:

20 Docket Control
21 Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

22 **COPY** of the foregoing faxed and mailed
23 this 19th day of September, 2007, to:

24 Matthew Neubert
25 Securities Division
Arizona Corporation Commission
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26 Phoenix, Arizona 85007

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